UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

United States of America and States of the United States, ex rel. Patrick Donohue,

Plaintiffs,

-against-

RICHARD CARRANZA, in his official capacity as the former Chancellor of New York City Department of Education, et al.,

Defendants.

1:20-cv-05396-GHW-SDA

NOTICE OF MOTION

PLEASE TAKE NOTICE, that, upon the attached Memorandum of Law, and all the proceedings heretofore had herein the Defendants, Wake County Public School District and Cathy Quiroz Moore ("Wake County Defendants") will move before the Honorable Stewart D. Aaron, U.S.M.J. of the United States District Court for the Southern District of New York, at the United States District Courthouse, located at 500 Pearl Street, New York, NY 10007, at a time and place to be scheduled by this Court, for an order pursuant to Rule 12(b) of the Federal Rules of Civil Procedure and Local Civil Rule 11.1 granting Wake County Defendants' Motion to Dismiss Plaintiff-Relator's Second Amended Complaint.

Dated: June 30, 2022

WOOD, SMITH, HENNING & BERMAN LLP

By:

Christopher J. Seusing

John A. Darminio

Attorneys for Defendants
Wake County Public School F

Wake County Public School District

and Cathy Quiroz Moore

5 Waller Avenue, Suite 200

White Plains, NY 10601

(914) 353-3861